URS

February 2, 2006

Mr. Jim Sheridan – Environmental Scientist
California Department of Fish and Game
78-078 Country Club Drive, Suite 109
Bermuda Dunes, CA 92203
760.200.9419

Subject: Information on Two Proposed Power Generation Facility Projects located in El Centro and Niland, Imperial County, California.

Dear Mr. Sheridan:

Thank you for taking the time to speak with me yesterday regarding the Imperial Irrigation District's (IID) upcoming power plant projects. As I had indicated, we have forwarded correspondence to the US Fish and Wildlife Service's Carlsbad office to make them aware of these projects, and to formally request that they provide us with their Lists of Species of Federal Concern. During that conversation, Mr. Kurt Roblich suggested that we also contact your office. As such, we wanted to make your office aware of these projects so that we may provide California Department of Fish and Game (CDFG) with any documentation or information concerning the projects you may require. Please know that in the course of preparing the Biological Resource section of the Small Power Plant Exemption (SPPE) document we will submit to the California Energy Commission (CEC), we have conducted a search of, among other things, CDFG's California Natural Diversity Data Base (CNDDB).

IID's Power Generation Division is proposing to construct power-generating facilities at two sites in Imperial County. One site is located at the existing IID El Centro Generation Station, and the other is located on an undeveloped parcel near the Community of Niland. These sites are indicated on the attached figure.

These two projects are summarized as follows:

<u>El Centro Generating Station (ECGS) Unit 3 Repowering Project</u>

The project is located at the existing El Centro Generating Station (ECGS) at 485 East Villa Road, El Centro, CA 92243. The El Centro Generating Station consists of four Units:

URS Corporation
8181 E. Tufts Avenue
Denver, CO 80237
Tel: 303.694.2770 and 303.740.2600
Fax: 303.694.3946

- Unit 1 - a 20 MW steam unit that has been shutdown and largely dismantled
- Unit 2 - a 30 MW steam unit that was re-powered in 1993 with a 75 MW combustion turbine and both the combustion turbine and steam turbine continue in operation
- Unit 3 – a 44 MW steam unit that is in operation and proposed to be repowered with a 75 MW combustion turbine under this AFC
- Unit 4 – a 80 MW steam unit that is in operation

IID proposes to repower the existing Unit 3 steam turbine generator (STG) utilizing a General Electric (GE) Frame 7EA Dry Low NOx (DLN) combustion turbine generator (CTG) and heat recovery steam generator (HRSG) to supply steam to Unit 3. The project consists of one (1) CTG/HRSG in combined cycle configuration that will be fired on natural gas. The CTG will be equipped with evaporative inlet air-cooling to improve capacity and efficiency at high ambient temperatures. The new Unit 3 Combustion Turbine Generator/Heat Recovery Steam Generator will be adjacent to the existing Unit 3 boiler on the west side of the existing power plant building and to the south of Unit 2.

The project site is located northeast of the City of El Centro on a 160 acre property owned by the IID. The property is not labeled with a Section number on the USGS 7.5-minute series El Centro quadrangle; however, it is identifiable as the quarter section below Section 47 that depicts features including reservoirs and oil tanks. The property is predominately disturbed with developed facilities, hard surface areas, and reservoirs. The property is relatively flat and is about 50 feet below sea level.

The Project utilizes the existing potable water, raw water, firewater, demineralized water, anhydrous ammonia, fuel gas, compressed air, and sanitary sewer systems common to the ECGS.

Niland Gas Turbine Plant Project

IID proposes to build a new 93 MW peaking power plant that will include a simple-cycle peaking facility consisting of two (2) GE LM6000 PD SPRINT NxGen combustion turbines generators (CTG) with inlet air chillers located adjacent to IID's existing Niland Substation. The project site is located northeast of the City of Niland on a 160 acre property owned by the IID. The power plant is located in the southwest quadrant of the property, to the northeast of the existing substation. The site is approximately 10 acres including construction lay down areas. The property legal description is R14E, T11S, S3, NE ¼. The property is predominately undisturbed native soil with some developed and

compacted soil areas. The property is relatively flat having a gradual ~1% decreasing grade from northeast to southwest. The elevation of the property is ~105' below sea level. The south half of the property is zoned M1U (manufacturing light industrial) and the north half of the property is zoned A2 (general agricultural). Acceptable M1U zoning uses include "Electric Power Generation", although a Conditional Use Permit is required for construction activities. Site improvements are limited to the southwest quadrant of the property where the existing Niland substation is located in the extreme southwest corner of the property. The project will be owned and operated by IID.

Transmission line corridors extend out from the Niland substation along the south and west sides of the property. An existing east-west distribution line, that runs along the south border of the plant site, will be rerouted so it runs north along the west side of the plant site and then turn east north of the plant site.

Natural gas will be supplied from one of two parallel Southern California Gas main pipelines that run along the east side of the property. The pipeline will be tapped immediately north of a regulating station that reduces the pressure of gas flowing further south. A new natural gas lateral pipeline will be routed west along Beal Road and then turn north into the metering station on the project site.

An existing Niland potable water main runs diagonally from the northeast to the southwest across the north half of the property. A lateral to serve the power plant will connect to the line near the center of the property and run to the plant site. New storm water retention basins will be located along the south edge of the project site in one of the transmission corridors.

The environmental work on these projects is being conducted by URS Corporation to support IID in the production of Application For Certification (AFC) documents to be provided to the California Energy Commission (CEC) to facilitate project approvals. Question: is pertinent to this letter whether an AFC or SPPE process will be conducted? Should we specify the project schedule or set some parameters around when we would want this coordination to occur?

The biological resources task leader for the project is Donald Mitchell, Senior Biologist, in the URS Santa Barbara office, and we authorize him to coordinate with you directly regarding matters pertaining to biological resources issues.

Douglas Hahn is the URS Project Manager and can be contacted regarding overall project questions, such as scheduling. Pertinent contact information is as follows:

Douglas Hahn
Senior Environmental Scientist
URS Corporation
8181 E. Tufts Ave.
Denver, CO 80237
Tel: 303.740.2628
Fax: 303.694.3946
Douglas_Hahn@urscorp.com

Don Mitchell
Senior Biologist
URS Corporation
130 Robin Hill Road, Suite 100
Santa Barbara, CA 93117
Tel: 805.964.6010
Fax: 805.964.0259
don_mitchell@urscorp.com

We thank you for facilitating the information request presented in this letter (what information request?) and we would be glad to provide you with any additional project materials that you request,

Sincerely,

URS Corporation

Douglas Hahn
Senior Environmental Scientist

cc: Henryk Olstowski - Imperial Irrigation District
Dana Diller - High Energy Resource Services
Rick York - California Energy Commission